

RACHEL B. ABRAMS (Cal Bar No. 209316)  
ADAM B. WOLF (Cal Bar No. 215914)  
SARA B. CRAIG (Cal Bar No. 301290)  
**Peiffer Wolf Carr Kane Conway & Wise, LLP**  
555 Montgomery Street, Suite 820  
San Francisco, CA 94111  
Telephone: 415.766.3544  
Facsimile: 415.840.9435  
Email: [rabrums@peifferwolf.com](mailto:rabrums@peifferwolf.com)  
Email: [awolf@peifferwolf.com](mailto:awolf@peifferwolf.com)  
Email: [scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)

TIFFANY R. ELLIS (*Admitted Pro Hac Vice*)  
**Peiffer Wolf Carr Kane Conway & Wise, LLP**  
15 E. Baltimore Ave  
Detroit, MI 48202  
Telephone: (313) 572-4727  
Facsimile: (415) 840-9435  
Email: [tellis@peifferwolf.com](mailto:tellis@peifferwolf.com)

CRISTINE FARAH (*Admitted Pro Hac Vice*)  
**Peiffer Wolf Carr Kane Conway & Wise, LLP**  
935 Gravier Street, Suite 1600  
New Orleans, LA 70112  
Telephone: (504) 523-2434  
Facsimile: (415) 840-9435  
Email: [cfarah@peifferwolf.com](mailto:cfarah@peifferwolf.com)

*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

**REPLY IN SUPPORT OF MOTION TO  
WITHDRAW AS COUNSEL FOR C.O.**

This Document Relates to:

Honorable Charles R. Breyer

*C.O. v. Uber Technologies, Inc., et al.,  
3:25-cv-02551-CRB*

**REPLY IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL FOR C.O.**

Counsel for Plaintiff C.O. respectfully submits this reply in support of their motion to withdraw as counsel. *See Docket No. 4432*. This motion was filed after diligent efforts to maintain

1 communication with Plaintiff. Unfortunately, circumstances outside counsel's control—  
2 including the inability to reach Plaintiff and maintain consistent communication—have made  
3 continued representation impractical and unreasonably difficult.

4  
5 Defendants have raised collateral concerns regarding Plaintiff's obligations under PTO  
6 31. Nevertheless, the communication breakdown between attorney and client underscores the  
7 impossibility of effective representation under current conditions.

8 A breakdown in communication and trust between attorney and client constitutes good  
9 cause for withdrawal, particularly where withdrawal will not prejudice other parties or delay  
10 proceedings. The Court has broad discretion to permit withdrawal under such circumstances, and  
11 courts in this Circuit have consistently found it appropriate when counsel cannot maintain contact  
12 or cooperation with their clients.

13 Under California Rule of Professional Conduct 1.16(b)(4), withdrawal is permitted when  
14 a client renders it unreasonably difficult for counsel to carry out representation effectively.

15  
16 Courts consider four factors when ruling on a motion to withdraw: (1) the reason for  
17 withdrawal, (2) potential prejudice to other litigants, (3) impact on the administration of justice,  
18 and (4) delay in resolving the case. *See Riese v. County of Del Norte*, 2013 WL 6056606, at \*1  
19 (N.D. Cal. Nov. 14, 2013). Each factor supports withdrawal here.

20  
21 1. Reason for Withdrawal. Counsel cannot meaningfully respond to Defendants' filings  
22 or advance the litigation without input from the Plaintiff. This factor favors withdrawal.

23 2. Prejudice to Other Litigants. Plaintiff is not a bellwether selected case. Plaintiff will  
24 receive all relevant materials and can obtain new counsel, proceed pro se, or choose not to pursue  
25 further action. There is no delay or prejudice to other litigants.

26  
27 3. Administration of Justice. Withdrawal will not disrupt the overall MDL proceedings.  
28 This case is among more than 2,500 and has no bearing on bellwether scheduling or trials.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

awolf@peifferwolf.com  
scraig@peifferwolf.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 25, 2025, I electronically transmitted the foregoing **REPLY IN SUPPORT OF WITHDRAW** to the Clerk's Office using the CM/ECF System for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants.

By: /s/ Rachel B. Abrams  
RACHEL B. ABRAMS